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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

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CLERK OF DISTRICT COURT
S.D. OF FLA. - MIA

CASE NO. 00-6022-CIV-LENARD/TURNOFF

HENRY NARANJO and
MARLENE RAMIREZ,

Plaintiffs,

v.

**AGREED MOTION FOR EXTENSION
OF TIME FOR PARTIES TO COMPLY
WITH PRE-TRIAL DEADLINES**

STEPHEN BYRON SMITH, PALMER
JOHNSON EXPORT SALES, INC.,
PALMER JOHNSON DISTRIBUTORS,
INC., and PALMER JOHNSON, INC.

COMES NOW, the Defendant PALMER JOHNSON, INC., and files this Agreed Motion for Extension of Time to Comply with Pre-Trial Deadlines, and as grounds therefor would say as follows:

1. That on or about September 26, 2000, the Court entered an Order granting the Plaintiffs' Motion to Extend Pre-Trial Deadlines.
2. That the granting of this Motion was based on the fact that several additional parties had been brought into the case by both the Plaintiffs and the Defendants, and due to the fact that PALMER JOHNSON, INC. had just entered the litigation; and, therefore, the discovery schedule proposed by the initial parties was no longer appropriate.
3. That through no fault of any of the parties herein, the earliest date that could be arranged for the Plaintiffs' depositions was January 11, 2001.



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4. Moreover, the parties estimate that there are approximately 15 fact witnesses who need to be deposed, in addition to the parties' experts.

5. Although the parties are mutually coordinating a substantial number of the fact depositions to take place during the period of January 11-15, 2001, it is likely that said witnesses will identify additional witnesses, who must then also be deposed.

6. That based on the above, the parties are therefore requesting a 150-day extension of the deadlines referred in the Court previous Order in order to complete all potential fact and expert discovery.

7. However, the parties wish to maintain the November 12, 2001 trial date.

8. Under the proposed extensions in this Motion, fact and expert discovery will still be completed by September 1, 2001, over 2 months prior to the trial date.

9. That all the parties to this litigation have been contacted concerning this Motion and are in agreement herewith.

WHEREFORE, the Defendant PALMER JOHNSON, INC., respectfully requests that the Court enter an Order granting this Motion and providing that fact and expert discovery be completed by September 1, 2001; that the Plaintiffs furnish their Expert Witness List to the Defendants by June 1, 2001; that Defendants furnish their Expert Witness List by July 15, 2001; that all expert discovery be completed by September 1, 2001, and that all pre-trial motions and memoranda of law, as well as any motions to exclude or limit proposed expert testimony, be filed by September 15, 2001.

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CERTIFICATE OF SERIVE

IT IS HEREBY CERTIFIED that a true and correct copy of the foregoing was furnished by mail on the 26 day of December 2000 to: Manuel Valdes, Esq., Rivkind & Pedraza, P.A., 66 W. Flagler St., Suite 600, Miami, FL 33130; F. David Famulari, Esq., Underwood, Karcher & Karcher, P.A., 2900 SW 28th Terrace, 6th Floor, Miami, FL 33133; and John D. Kallen, Esq., Badiak, Will & Kallen, 17071 W. Dixie Hwy., N. Miami Beach, FL 33160.

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By: 

FRANK J. SIOLI
Fla. Bar No. 9652